AF/2632
120
#23

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re Appln. Of:	CARROLL
Serial No.:	09/883,703
Filed:	June 18, 2001
For:	APPARATUS AND SYSTEM FOR IDENTIFYING . . .
Group:	2632
Examiner:	NGUYEN, TAI T.

DOCKET: SCP 00.01

MAIL STOP APPEAL BRIEF - PATENTS
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

APPELLANT'S BRIEF ON APPEAL

TABLE OF CONTENTS

HAYES SOLOWAY P.C.
130 W. CUSHING STREET
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
TEL. 603.668.1400
FAX. 603.668.8567

TABLE OF CASES

Page

TABLE OF AUTHORITIES

OTHER

HAYES SOLOWAY P.C.
130 W. CUSHING STREET
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
TEL. 603.668.1400
FAX. 603.668.8567

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re Appln. Of:	CARROLL
Serial No.:	09/883,703
Filed:	June 18, 2001
For:	APPARATUS AND SYSTEM FOR IDENTIFYING . . .
Group:	2632
Examiner:	NGUYEN, TAI T.

DOCKET: SCP 00.01

MAIL STOP APPEAL BRIEF - PATENTS
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

APPELLANT'S BRIEF ON APPEAL

This Brief is being filed in support of Appellant's Appeal from the Final Rejection by the Examiner to the Board of Appeals and Interferences, the Notice of which was timely filed under Certificate of Mailing on April 26, 2004.

REAL PARTY IN INTEREST

The Real Party in Interest in this Application is Secure Care Products, Inc., which has a place of business at 39 Chenell Drive, Concord, NH 03301-8501. Secure Care Products, Inc. received an Assignment of all right, title and interest in the Application through an Assignment executed by executed by the inventor, Craig Carroll, on June 8, 2001, and by virtue of his employment by Secure Care Products, Inc. The Assignment to Secure Care Products, Inc. was submitted to the U.S. Patent and Trademark Office for recordation on June 18, 2001, and was

HAYES SOLOWAY P.C.
130 W. CUSHING STREET
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
TEL. 603.668.1400
FAX. 603.668.8567

recorded in the U.S. Patent and Trademark Office on June 18, 2001 at Reel 011916, Frame 0358.

RELATED APPEALS AND INTERFERENCES

To the best of the knowledge of the undersigned attorney and Appellant, there are no other appeals or interferences that would directly affect, or be directly affected by, or have a bearing on, the Board's decision in the present Appeal.

STATUS OF THE AMENDMENTS

Appellant's Amendment D under Rule 116, containing Remarks Only, submitted under Certificate of Mailing dated April 26, 2004 has not yet received Action from the Examiner. However, since no claim changes were made, it is believed that the Rule 116 Amendment should be entered as a matter of right.

STATUS OF THE CLAIMS ON APPEAL

Claims 1-3, 5, 8-14, 16, 19 and 20 are pending in the current Application. Claims 1-3, 5, 8-14, 16, 19 and 20 stand finally rejected and are on Appeal. The claims on Appeal are set forth in **Appendix A** attached hereto.

BACKGROUND OF THE INVENTION ON APPEAL

The invention on Appeal relates to an improved system for identifying an infant-mother match in the hospital that is independent of name and allows for verification before the infant is brought into the mother's presence.

HAYES SOLOWAY P.C.
130 W. CUSHING STREET
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
TEL. 603.668.1400
FAX. 603.668.8567

Traditionally, prior to the present invention, when a pregnant woman arrives at a hospital, she is fitted with an identification band containing pertinent identifying information. When her baby is born, the infant is fitted with an identification band that typically contains the same information that is on the mother's band. While the infant is in the hospital following birth, it may be transported to various locations throughout the hospital. When the infant is returned to its mother, the bands on the mother and infant are compared by visual inspection to insure the proper identity of the infant. This system of identification has two disadvantages. First, in a large hospital where there are many patient rooms and the maternity ward may span several floors or corridors, there is a possibility that two or more mothers/infants may have similar names resulting in an infant being brought to a patient who is not its mother. When the problem is realized and corrected, there is bound to be a degree of emotional stress, especially during the highly emotional time surrounding childbirth.

The second disadvantage of the prior art is that it requires that the infant and mother be brought into close proximity for visual inspection of the identification bands each time the infant is brought into the mother's room. If the infant is already in the mother's presence, perhaps even in her arms, before an error in identification is realized, this again may result in emotional stress.

It is therefore desirable to have a system that overcomes the deficiencies of the prior art by allowing verification of a mother-infant match that is independent of name and will allow for verification before the infant is brought into the mother's presence.

(Specification, p. 1, line 15 to p. 3, line 5)

HAYES SOLOWAY P.C.
130 W. CUSHING STREET
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
TEL. 603.668.1400
FAX. 603.668.8567

SUMMARY OF THE INVENTION ON APPEAL

The invention on Appeal is an identification system that overcomes the above discussed and other disadvantages of the prior art. More particularly, in accordance with the present invention there is provided on electronic identification system comprising a matched transmitter-receiver pair that transmits a unique identification code corresponding to an infant and its mother.

An identification system consistent with Appellant's claimed invention includes a plurality of transmitters, each transmitter being configured to transmit only a single unique signal comprising a unique identification code corresponding only to that one transmitter. The identification system also comprises a plurality of receivers, each receiver being configured to receive only one signal whereby to establish a comparison indication based on comparison of a unique identification code with a unique reference code. Each receiver is programmed to respond in the affirmative to a unique identification code that matches a receiver with only one transmitter. Also, each receiver includes a user interface configured to program a memory. (See claim 1).

The basic element of the identification system of the claimed invention comprises a matched transmitter-receiver pair. In one potential embodiment, the transmitters (see Appellant's Drawings, fig. 3, item 102) are attached to each infant and receivers (104) are mounted outside each mother's hospital room near the door (302). As an infant is brought down the hallway (300) of the maternity ward, the receivers (104) will detect the signal from the infant's transmitter (102) as it passes near the receivers (104). A display (FIG. 2) on the receiver (FIG. 3, item 104) will indicate whether or not the infant is a match with the mother in

HAYES SOLOWAY P.C.
130 W. CUSHING STREET
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
TEL. 603.668.1400
FAX. 603.668.8567

the room. Thus, the identity of the infant can be determined quickly without having to physically bring the infant and mother into close proximity prior to making this determination. This represents an improvement over the prior art, preventing the situation where an infant may be brought into a mother's room and subsequently found not to belong to that mother, described *supra* in the Background discussion. (Specification, page 5, line 7 through page 6, line 8; page 9, lines 9-14).

ISSUES PRESENTED ON APPEAL

The issue presented on Appeal is:

Whether claims 1-3, 5, 8-14, 16, 19 and 20 are unpatentable under 35 USC § 103(a) over Radomsky et al. (U.S. Patent No. 6,211,790) in view of Wolk et al. (U.S. Patent No. 4,853,692) and Vercellotti et al. (U.S. Patent No. 5,317,309).

THE FINAL ACTION

In finally rejecting the claims on Appeal, the Examiner states the following:

> 2. Claims 1-4 [sic], 5, 8-14, 16, and 19-20 are rejected under 35 U.S.C. 103(a) as being unpatentable over Radomsky et al. (US 6,211,790) in view of Wolk et al. (US 4,853,692) and Vercellotti et al. (US 5,317,309).

(Office Action dated March 24, 2004 (hereinafter "Final Action"), page 2, cipher 2)

In finally rejecting independent claims 1 and 11 on appeal, the Examiner states the following:

> ... Radomsky et al. disclose infant and parent matching and security system including all subject matters as follows:

HAYES SOLOWAY P.C.
130 W. CUSHING STREET
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
TEL. 603.668.1400
FAX. 603.668.8567

a plurality of transmitters (30, 32), each transmitter being configured to transmit only a unique signal (34, 36) containing a unique identification code (as shown in Figure 2; col. 6, lines 6-23); and

a plurality of receivers (20, 21), each receiver being configured to receive only one signal (34, 36) and establish a comparison indication based on comparison of the identification code with a reference code (as shown in Figure 2; col. 6, lines 5-39).

Radomski [sic] et al. disclose the instant claimed invention except for: each of the transmitters and receivers being configured with a unique identification code that matches each receiver with only one transmitter and the receiver comprises programmable memory for storing the unique reference code and the receiver includes a user interface configured to program the memory.

Wolk et al. disclose an infant security/identification system (figure 1) comprising: a plurality of transmitters (7A-7Z, figure 1), each of which being configured to transmit a signal comprising a unique identification code corresponding only to the transmitter (col. 5, lines 21-35); and a plurality of receivers (13A-13Z, figure 1), each receiver being configured to receive the one signal whereby to establish a comparison indication based on comparison of unique identification code with a unique reference code (col. 6, lines 22-34). It would have been obvious to a person having ordinary skill in the art at the time invention was made to have each of the transmitters and the receivers of Radomski [sic] et al. have a separate unique identification code, as suggested by Wolk et al., for the purpose of preventing misidentification of the infant.

Vercellotti et al. teach a dual mode electronic identification system including a tag (4) having a RF transmitter and receiver, wherein the tag (4) is responding to an interrogation signal by transmitting identification data to the interrogator (see abstract), wherein the tag (4) comprises a programmable memory (15) for storing the identification code and a user interface (25) configured to program the memory (see figure 2; col. 4, lines 30-48). Therefore, it would have been obvious to a person having ordinary skill in the art at the time the invention was made to utilize the memory and the memory interface as taught by Vercellotti et al. into the system as disclose [sic] by Radomsky et al., as modified,

HAYES SOLOWAY P.C.
130 W. CUSHING STREET
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
TEL. 603.668.1400
FAX. 603.668.8567

for the purpose of enhancing identification code upon user for security purpose.

(Final Action, pages 2-3, cipher 2.)

GROUPING OF CLAIMS

Claims 1-3, 5, 8-14, 16, and 19-20 are grouped together as containing the same essential patentable limitations, and thus stand or fall together.

THE REFERENCES

Radomsky et al., U.S. Patent No. 6,211,790 ("Radomsky et al.")

Radomsky et al. teaches a system that can be used to match an infant and mother, to monitor an infant's presence within the hospital or maternity ward, and to detect unauthorized removal of the infant from the ward or hospital (col. 2, lines 61-68). The mother and the infant each wear transmitters (col. 5, line 64 through col. 6, line 24). Thus, Radomsky et al. requires at least two transmitters per receiver to make a proper identification. Receivers placed throughout the hospital decode the signals within their range of reception (col. 5, lines 28-41). The receivers are required to have sufficient processing capability to decode and process signals from both the infant and the mother, and to provide a signal indicating that the mother and infant have been correctly matched together (col. 6, line 54 to col. 7, line 3). Information decoded by the receivers is mapped to a database maintained by a central server (col. 6, lines 13-17).

Wolk et al., U.S. Patent No. 4,853,692 ("Wolk et al.")

Wolk et al. teaches a system for preventing the theft of a valuable object. The system also may be used to prevent kidnapping of a newborn while it is in the hospital. A transmitter

HAYES SOLOWAY P.C.
130 W. CUSHING STREET
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
TEL. 603.668.1400
FAX. 603.668.8567

is attached to the object to be protected. The transmitter generates at least two uniquely coded signals (col. 1, lines 59-63). These signals are called the "maintenance signal" and the "tamper signal" (col. 3, lines 5-6). The receiver is placed at the location from which the object is not to be removed. This receiver continuously receives the maintenance signal from the transmitter. When the receiver fails to receive the maintenance signal (i.e. the transmitter is moved out of the receiver's range of reception), the receiver generates an alarm signal. Also, if the transmitter is disconnected from the object to which it is attached, the transmitter sends a tamper signal to the receiver and the receiver again generates an alarm (col. 6, lines 35-44). Thus, the system taught by Wolk et al. requires a transmitter with at least two coded signal generators (col. 3, lines 5-6).

Vercellotti et al., U.S. Patent No. 5,317,309 ("Vercellotti et al.")

Vercellotti et al. teaches a dual mode electronic identification system. In this system, an electronic identification tag is attached to a moving object, such as a person approaching the door to a secure area. The tag has both a transmitter and a receiver. The tag responds to an interrogation signal from a nearby access transmitter, located over the door, for example. After receiving the interrogation signal, the tag transmits an identification code to the access receiver over the door. The tag also periodically transmits a beacon signal that is received by a beacon signal processing means to determine the physical position of the tag. The pertinent information used by the Examiner involves the memory interface (25) of the tag. The tag contains an application specific integrated circuit (14) ("ASIC"). The ASIC (14) contains a memory interface (25) that allows it to send and receive data from an external non-volatile

HAYES SOLOWAY P.C.
130 W. CUSHING STREET
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
TEL. 603.668.1400
FAX. 603.668.8567

memory chip (15). The identity information of the tag is preprogrammed on the non-volatile memory chip (col. 4, lines 45-49).

ARGUMENT ON APPEAL

THE REJECTION OF CLAIMS 1-3, 5, 8-14, 16, 19 and 20 UNDER 35 U.S.C. §103(a) AS UNPATENTABLE OVER RADOMSKY ET AL. IN VIEW OF WOLK ET AL. AND VERCELLOTTI ET AL. IS IMPROPER BECAUSE THE COMBINATION OF THESE REFERENCES DOES NOT TEACH OR RENDER OBVIOUS APPELLANT'S INVENTION.

A. The Primary Reference Radomsky et al. Fails to Teach the Claimed Invention, and in Fact, Teaches away from the Claimed Invention.

1. Radomsky et al. does not teach a plurality of transmitters and receivers, each of which is uniquely matched to each other.

A proper obviousness rejection under 35 U.S.C. § 103 must show some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine the teachings. The prior art references when combined must teach or suggest all the claim limitations. The teaching or suggestion must be found in the prior art, and not based on Appellant's disclosure. M.P.E.P. § 706.02(j), see also In Re Vaeck, 947 F.2d 488, 493 (Fed. Cir. 1991).

The primary references Radomsky et al. actually teaches away from the claimed invention, and does not obviate the need to bring the infant and the mother together in the same room for purposes of identification. Appellant's Independent claims 1 and 11 require that "each said receiver is programmed to respond positively to said unique identification code that matches said receiver with *only one* said transmitter." (emphasis added). Radomsky et al. teaches using two transmitters instead of one, with one transmitter attached to the mother and

HAYES SOLOWAY P.C.
130 W. CUSHING STREET
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
TEL. 603.668.1400
FAX. 603.668.8567

one to the infant. (Radomsky et al., col. 3, lines 1-4). These transmitters send signals to a receiver typically mounted inside the mother's room (col. 5, lines 28-31; FIG. 2, items 12 and 20). The receiver then receives signals from both transmitters, and compares those signals to determine if the transmitters match (col. 6, line 59 to col. 7, line 3).

Radomsky et al. requires *at least two* transmitters and one receiver to make an identification (col. 6, lines 24-28; col. 6 line 59 to col. 7, line 3; FIG. 2, items 30, 32, and 20). Thus Radomsky et al. does not teach "each said receiver is programmed to respond positively to said unique identification code that matches said receiver with *only one* said transmitter" (emphasis added), as is required by the independent claims of Appellant's invention. In Radomsky et al. the receiver is not matched to a single transmitter. Rather the transmitters are matched to one another and the receiver is required to compare the signals from the two transmitters (col. 6, line 54 to col. 7, line 3).

The transmitter signals taught in Radomsky et al. used for purposes of identification (matching mode) are infrared (IR) signals (col. 3, lines 4-9; col. 6, line 59 to col. 7, line 3). Since identification requires signals from *two* transmitters to be compared, both transmitters are required to be brought within the optical range the IR receiver. By design, this makes identification impossible with the infant outside of the mother's room (col. 6, lines 24-30). Consequently, Radomsky et al. uses proximity to determine identification which requires that the infant and mother be brought into the same room prior to identification (col. 3, lines 4-9). This creates the same undesirable situation (bringing the infant within close proximity of the mother prior to identification) that provided the impetus for Appellant's claimed invention.

HAYES SOLOWAY P.C.
130 W. CUSHING STREET
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
TEL. 603.668.1400
FAX. 603.668.8567

The claimed invention therefore represents an improvement over the prior art, including Radomsky et al.

The fact that Radomsky et al. requires two transmitters and the claimed invention requires only one was introduced into the prosecution history in Appellant's first Amendment (See Amendment A, p. 4, para. 2; Amendment B, p. 2, paras. 2-3. Amendments A and B are incorporated herein by reference). The Examiner has not expressly addressed this argument in any subsequent communication.

2. The Examiner concedes that the primary reference Radomsky et al. fails to teach all elements of the claimed invention.

The Examiner concedes that Radomsky et al. fails to teach

> . . . each of the transmitters and receivers being configured with a unique identification code that matches each receiver with only one transmitter and the receiver comprises programmable memory for storing the unique reference code and the receiver includes a user interface configured to program the memory.

(Final Action, p. 2, para. 7 to p. 3, para. 1).

As will be discussed below, the secondary references Wolk et al. and Vercellotti et al. do not provide the missing teachings to achieve or render obvious the claims on Appeal.

B. The Secondary References Wolk et al. and Vercellotti et al. Alone or in Combination do not Provide the Missing Teachings to Radomsky et al. to Achieve or Render Obvious the Claimed Invention.

1. Wolk et al. fails to provide the missing teachings to Radomsky et al. to achieve or render obvious the claimed invention.

The Examiner suggests that Wolk et al. discloses an infant security/identification system comprising, among other things, a plurality of receivers, each receiver configured to receive *one signal* to establish a comparison indication based on comparing a unique

HAYES SOLOWAY P.C.
130 W. CUSHING STREET
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
TEL. 603.668.1400
FAX. 603.668.8567

identification code with a unique reference code (Final Action, p. 3, para. 2). The Examiner concludes that

> "... it would have been obvious to a person having ordinary skill in the art at the time the invention was made to have each of the transmitters and the receivers of Radomsky et al. have a separate unique identification code, ...

(Final Action, p. 3, para. 2)

Wolk et al. does not teach a system in which each receiver is configured to receive only one uniquely coded signal, as required by the claimed invention. Wolk et al. teaches a system comprising a "transmitting device which generates *at least two* uniquely coded signals ..." (Wolk et al., col. 1, lines 59-62, emphasis added), i.e. a maintenance signal and a tamper signal. Wolk et al. is concerned only with presenting removal (kidnapping) of an infant. Nowhere is there any disclosure or suggestion in Wolk et al. of matching infant to mother. In Wolk et al. the transmitter contains two coded RF signal generators (col. 3, lines 5-6). The receiver has two channels tuned to receive each of the two signals (maintenance and tamper) from the transmitter (col. 6 lines 22-25). Thus, Wolk et al. is concerned with an entirely different problem, and it would not be obvious to combine Radomsky et al. and Wolk et al., as suggested by the Examiner. Moreover, even if one were to combine Radomsky et al. and Wolk et al., the above mentioned disadvantages of Radomsky et al., i.e. of the need to bring the infant and mother together, would still be present.

2. Vercellotti et al. also fails to provide the missing teachings to Radomsky et al. and Wolk et al. to achieve or render obvious the claimed invention.

The Examiner concedes that Radomsky et al. fails to provide the necessary teaching that "the receiver comprises programmable memory for storing the unique reference code and the

HAYES SOLOWAY P.C.
130 W. CUSHING STREET
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
TEL. 603.668.1400
FAX. 603.668.8567

receiver includes a user interface configured to program the memory," as required in independent claims 1 and 11 (Final Action, p. 3, para. 1). However, the Examiner relies on Vercellotti et al. to provide this missing teaching. Vercellotti et al. does not teach a user interface configured to program the memory. The Examiner erroneously refers to the "memory interface" of Vercellotti et al., FIG. 2, item 25, as a "user interface" (Final Action, p. 3, para. 3). The memory interface (FIG. 2, item 25) taught by Vercellotti et al. is an interface for data transmission between two integrated circuits, a non-volatile memory chip (FIG. 2, item 15) and an application specific integrated circuit, abbreviated as ASIC (FIG. 2, item 14) (Vercellotti et al., col. 4, lines 38-44). This is not an interface between a user and the device, enabling the user to program the memory of the device, as required by the claimed invention. In fact, Vercellotti et al. teaches that the non-volatile memory (15) is preprogrammed (Vercellotti et al., col. 4, lines 44-49). Vercellotti et al. teaches no means for a user to program the memory as required by the claimed invention (see Appellant's Drawings, FIG. 5, item 534). Therefore, Vercellotti et al. fails to supply the teaching that the Examiner concedes is missing in Radomsky et al. Moreover, Vercellotti et al. also is not designed to match an infant and mother. Vercellotti et al. is an access identification system comprising a tag to be worn on a person and receiver designed for attachment to a fixed location, such as a portal or the like. There is no teaching or suggestion in Vercellotti et al. of a plurality of transmitters and receivers, as requested by Appellants' claims 1 and 11, for identifying an infant-mother match. Thus, no combination of Radomsky et al., Wolk et al. and Vercellotti et al. would achieve or render obvious claims 1 and 11 or any of the claims 2, 3, 5, 8-10, 12-14, 16, 19 or 20 dependent thereon.

HAYES SOLOWAY P.C.
130 W. CUSHING STREET
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
TEL. 603.668.1400
FAX. 603.668.8567

CONCLUSION

Standing alone or in combination, Radomsky et al., Wolk et al. and Vercellotti et al. fail to achieve or render obvious Appellant's claimed invention under 35 U.S.C. § 103(a). Thus, the Examiner's Final rejection of claims 1-3, 5, 8-14, 16, and 19-20 is in error, and it is requested that and the Rejection be reversed in all respects.

Respectfully submitted,

Norman P. Soloway
Attorney for Appellant
Reg. No. 24,315

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: MAIL STOP APPEAL BRIEF - PATENTS, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on June 24, 2004, at Tucson, Arizona.

By

NPS/JBK:nm

HAYES SOLOWAY P.C.
130 W. CUSHING STREET
TUCSON, AZ 85701
TEL. 520.882.7623
FAX. 520.882.7643

175 CANAL STREET
MANCHESTER, NH 03101
TEL. 603.668.1400
FAX. 603.668.8567